

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Richard M. Zelma

Plaintiff

Vs.

**Michael Peter Halperin, ("Halperin")
Individually, as owner, manager,
founder and director of HFA Holdings
LLP., d/b/a, IP Horizon Inc.,
and;**

**Michael Peter Halperin, d/b/a HFA
Holdings LLP. ("HFA"), a/k/a, d/b/a, IP
Horizon Inc., SkyeTel, Call48,
MHLHTH Holdings LLC., and all of
Halperins currently unknown shell
companies**

and;

**DOE Telemarketers (1-20), ABC
Corporations' (1-20), Resellers, Call-
Centers, working with, benefiting
from, participating in, affiliated or
doing business with the named
Defendants'; (Hereinafter "the
Halperin Defs'), each acting
individually, in concert or as a group.**

Defendants'

CIVIL ACTION NO. 2:24-cv-01059 -ES-JRA

Removed from the Superior Court of
New Jersey Law Division, Bergen County;

Original Docket No. BER-L- 5354-23

**NOTICE OF MOTION TO
REMAND PLAINTIFFS COMPLAINT
BACK TO STATE COURT**

PLEASE TAKE NOTICE that Plaintiff Richard M. Zelma has filed a Motion to Remand, pursuant to 47 U.S.C. §227 *et seq*; 28 U.S.C. §§1331, 1332, 1441 and 1446 *et seq* and all other applicable law, copies of which are attached hereto, with the United States District Court for the District of New Jersey.

/s/ Richard Zelma
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Dated: March 8, 2024